

# EXHIBIT A

**AB Litigation Services**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

Civil Action No. 1:22-CV-00155-KHR

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ZOOM 30(b)(6) DEPOSITION OF MO POW 3, LLC, AND  
MO POW 4, LLC, BY THOMAS GUEL, AND THOMAS GUEL,  
INDIVIDUALLY - November 15, 2023  
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Plaintiffs:

MO POW 3, LLC AND MO POW 4, LLC,

v.

Defendant:

CRYPTO INFINITI, LLC.  
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APPEARANCES:

HOLLAND & HART, LLP  
By Jeffrey S. Pope, Esq.  
2515 Warren Avenue, Suite 450  
Cheyenne, Wyoming 82001  
Appearing via Zoom on behalf of  
Plaintiffs

HATHAWAY & KUNZ, LLP  
By Tyler J. Garrett, Esq.  
2515 Warren Avenue, Suite 500  
Cheyenne, Wyoming 82001  
Appearing via Zoom on behalf of  
Defendant

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1 data centers for that for a couple of years.

2 Q Okay. And let's go through those. Are  
3 you referring to MO POW 1 through 4?

4 A Those would be included, yes.

5 Q What others?

6 A There's a site in Texas.

7 Q And what's that one called and what  
8 entity runs that?

9 A It is unrelated to MO POW 3 and 4.

10 Q Okay. But could you answer my question,  
11 please?

12 A I believe that's owned by Amalgamated.

13 Q So other than MO POW -- or MO POW 1  
14 through 4 and the Texas site, that consists of your  
15 experience in the crypto industry?

16 A Correct.

17 Q Would it be fair to say you don't have  
18 much experience in the crypto industry?

19 A I don't think that's fair to say.

20 Q All right. Tell me why.

21 A You've got multiple -- multiple examples  
22 of experience that you just mentioned.

23 Q You tell me. Let's go through them.

24 A I just told you. You've got multiple  
25 LLCs for a number of years operating in the space.

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1 continue on so we don't waste all day here if  
2 that's possible. We can get the answer for that.  
3 I just need to double-check. Let's push forward.  
4 At the next break, I'll find out; is that fair?

5 Q Yeah, that's fair. We're going to  
6 approach the lunch hour anyhow, so that will be a  
7 good time to do it.

8 Aside from the project with Crypto  
9 Infiniti at the site at 5501 East Farm Road 112,  
10 Strafford, Missouri, what other projects was MO POW  
11 4 involved in?

12 A None.

13 Q Did MO POW 4 actually provide any hosting  
14 services to Crypto Infiniti as set forth in the  
15 master hosting services agreement?

16 A No.

17 Q Let's talk about the MO POW 4 site, and  
18 that one is at 5501 East Farm Road 112, Strafford,  
19 Missouri. What was the status of the site when the  
20 contract was entered into with Crypto Infiniti?  
21 And by "status," I mean -- I think we all know what  
22 I mean at this point -- the physical development of  
23 the site for hosting services.

24 A As it relates to Crypto Infiniti?

25 Q Correct.